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Attorneys for Defendant
Quality Communications, Inc.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JOSEPH VALDEZ, individually,)	
)	
Plaintiff,)	
)	Case No. 2:09-cv-01797-PMP-NJK
v.)	
)	
COX COMMUNICATIONS LAS)	MOTION TO REDUCE COSTS
VEGAS, INC., VIDEO INTERNET)	AWARD TO JUDGMENT AGAINST
PHONE INSTALLS, INC., QUALITY)	VALDEZ
COMMUNICATIONS, INC., and)	
SIERRA COMMUNICATIONS, CO.,)	
)	
Defendants.)	
)	
)	
)	

Pursuant to FRCP 69, defendant Quality Communications, Inc. requests that this Court issue a judgment for the costs award in the amount of \$1,459.30 against Plaintiff-Appellant

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1 Joseph Valdez. This motion is based on the attached memorandum of points and authorities.

2 Respectfully submitted,

3 LIONEL SAWYER & COLLINS

4
5 By: /s/ Malani L. Kotchka

6 Malani L. Kotchka
7 1700 Bank of America Plaza
8 300 South Fourth Street
9 Las Vegas, Nevada 89101

10 Attorneys for Defendant
11 Quality Communications, Inc.

12 **MEMORANDUM OF POINTS AND AUTHORITIES**

13 On March 4, 2014, this Court ordered that costs were taxed against appellant
14 Joseph Valdez in the amount of \$1,459.30. Exhibit A. Valdez's counsel Leon Greenberg has
15 indicated that Valdez will not pay the costs voluntarily. Therefore, defendant Quality
16 Communications, Inc. respectfully requests that this Court enter a judgment against Joseph
17 Valdez in the amount of \$1,459.30. Upon receipt of the judgment, defendant Quality
18 Communications, Inc. will be able to obtain a writ of execution.

19 Respectfully submitted,

20 LIONEL SAWYER & COLLINS

21 By: /s/ Malani L. Kotchka

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24 300 South Fourth Street
25 Las Vegas, Nevada 89101

26 Attorneys for Defendant
27 Quality Communications, Inc.

28 IT IS SO ORDERED.



PHILIP M. PRO, U.S. District Judge

Dated: December 4, 2014